



RE: WER Confirmation Tests Memo

William
Dan Graham to: Beckwith, 12/08/2010 09:30 AM
Powell, James
"McGee, William D (DEC)",
Cc: "Diamond, Jerry" ,
"Rimelman, Ronald" ,

History: This message has been replied to and forwarded .

1 attachment



WER comparison using Totals 20101208.pdf

Bill and Jim -

Got in touch with Tetra Tech and have the following for you:

Totals from original WER test - see the attached summary memo. We can provide more detail at your request, but this quickly summarizes what the total recoverable levels would be if the WER was calculated based on total recoverable all the way through. As a reminder, the Dec 1 memo discusses using the dissolved:total ratio from the original test sample in hopes of doing the confirmation test to achieve as best possible the dissolved amounts being proposed in the site specific criteria. Thus, what we are planning to spike to is less than what this calculation shows.

In regards to running a range of test levels, I have placed the request. They will look at the sample volume delivered and logistics and see if they are able to accommodate that request. Those samples are currently in transit. We will keep you posted.

As far as this mornings e-mail regarding measuring total recoverable levels - although it is not required by the WER guidance, based on TT's interpretation, we will add a total recoverable as a measured parameter to the end of the test procedure as well as the originally planned measurement at the beginning.

Thanks. I will be tied up most of the rest of today but will check e-mails this evening.

Dan Graham, PE
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-----Original Message-----

From: Beckwith.William@epamail.epa.gov [mailto:Beckwith.William@epamail.epa.gov]
Sent: Tuesday, December 07, 2010 4:49 PM
To: Powell, James E (DEC)
Cc: Dan Graham; McGee, William D (DEC); Diamond, Jerry; Rimelman, Ronald
Subject: Fw: WER Confirmation Tests Memo

Jim - Sending this to summarize my thoughts from the conversation we just had concerning the attached Tetra Tech memo dated 12/1/10. That memo was sent to us by Dan Graham of PacRim Coal by email of 12/6/10 and concerns the metals mixture test that PacRim/Tetra Tech intends to conduct to evaluate if the individual proposed Chuitna site-specific metals criteria for Cu, Pb, Zn, and Al are protective in combination. It addresses the approach that Tetra Tech used to estimate the total metals concentrations necessary to ensure that the mixture contains dissolved metal at the proposed dissolved acute site-specific criteria concentration for each individual metal.

- To my knowledge we have not seen the total metals data from the individual WER test. That data should be reviewed as part of the review of the metals mixture test, and considered before any conclusions are drawn on the results of the metals mixture test or any proposal to calculate total recoverable WERs and total recoverable site-specific criteria (note that Dan's subsequent email, also of 12/6/10, indicated that the site water sample would be collected today for testing this week).

- As noted in my 11/19/10 email, TSS and stream flow should be added to the measurements to be conducted on the site water sample that were listed in Tetra Tech's 11/18/10 memo (page 3) concerning the metals mixture testing.

- As ADEC and EPA have suggested previously, PacRim should consider including a series of mixed metal concentrations/treatments in the test design, with treatments below and possibly above the proposed target mixture. This could be useful in the event that the proposed target mixture is toxic and might help ensure that the targeted dissolved concentrations are achieved.

Since my time around the office is limited, I am copying Dan and Tetra Tech now.

- Bill
206-553-2495

----- Forwarded by William Beckwith/R10/USEPA/US on

12/07/2010 04:40 PM

From: Dan Graham <dan@pacrimcoal.com>
To: "McGee, William D (DEC)"
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Cc: "Diamond, Jerry"
<Jerry.Diamond@tetrattech.com>, "Rimelman,
Ronald" <Ronald.Rimelman@tetrattech.com>
Date: 12/06/2010 10:46 AM
Subject: WER Confirmation Tests Memo

Bill, Pete and Jim -

Attached is a memo from Tetra Tech to me explaining the final test procedure to be used for the WER confirmation tests. In our last discussion, Bill had some questions regarding total to dissolved ratio. This information is contained herein.

Please take a moment to review this document. If you have any question or comments regarding the final test, please get those to us by the close of business tomorrow.

Thanks! Hope you all had a good weekend.

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(See attached file: confirmatory testing 20101203
Memo Final.pdf)